

Furthermore, as was brought to light during the investigation into allegations of sexual harassment made by Plaintiff, Plaintiff's management style was very demeaning, creating low morale in the telemarketing department.

Finally, the company's investigation revealed that Plaintiff had brought alcohol to work and provided it to her telemarketing staff during working hours. When allegations of drinking in the telemarketing department were first raised, in August 2000, not only did Plaintiff fail to reveal her involvement in the incident, she, herself, disciplined her staff.

This list is not meant to be exhaustive, but to provide specific examples of Plaintiff's deficient job performance.

6. a) Identify by name and job title all persons who played any role whatsoever in the decision to terminate Plaintiff.
- b) Describe completely the reason(s) for terminating Plaintiff.

**RESPONSE:**

- a) David McKinley, Director of Operations  
Daniel Goins, General Manager  
Julie Seger, Human Resources Director, Bridgeville Division, Ionics, Inc.  
Marianne Manson-Winsser, Director of Human Resources, Ionics, Inc.
- b) See Response to Interrogatory No. 5a-b.

12. Identify the name, job title, and gender of each employee terminated from Defendant from January 25, 1998 through January 25, 2002.

**RESPONSE:**

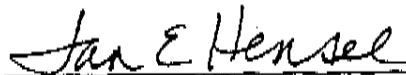
Objection. This Interrogatory calls for information which is not relevant and is not reasonably calculated to lead to admissible evidence. Notwithstanding this objection and without waiving same, Defendant refers Plaintiff to the document attached at Tab 9 to Defendant's May 3, 2001 Position Statement submitted to the EEOC, which Plaintiff's counsel has in her possession.

13. Identify the name, job title, and gender of each person hired by Defendant from January 25, 1998 through January 25, 2002.

**RESPONSE:**

Objection. This Interrogatory calls for information which is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

As To Objections,



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Attorneys for Defendant, General Ionics, Inc.

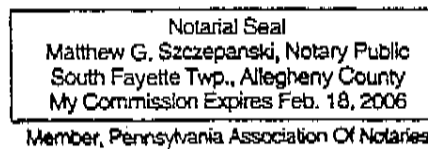
**VERIFICATION**

I, Julie Seger, hereby swear that the above responses to Interrogatories are true to the best of my personal knowledge.

Julie Seger

Sworn to before me and subscribed in my presence on April 10, 2002.

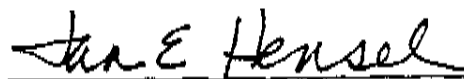
Matthew G. Szczepanski  
Notary Public



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **Defendant's Responses to Plaintiff's First Set of Interrogatories** was served by regular U.S. Mail, postage prepaid, on April 12, 2002 upon:

Megan Clark  
FREKING & BETZ  
215 E. 9<sup>th</sup> Street, 5<sup>th</sup> Floor  
Cincinnati, Ohio 45202  
*Attorney for Plaintiff*



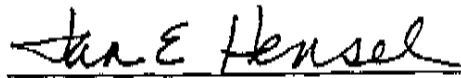
Jan E. Hensel

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Megan Clark  
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215 E. 9<sup>th</sup> Street, 5<sup>th</sup> Floor  
Cincinnati, Ohio 45202  
*Attorney for Plaintiff*



Jan E. Hensel

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